





Consortium for the Regional Support for Women in Disadvantaged and Rural Areas

Response to: Consultation on Free Period Products

Issued by: The Executive Office September 2023

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Women's Regional Consortium: Working to Support Women in Rural Communities and Disadvantaged Urban Areas

1. Introduction

- 1.1 This response has been undertaken collaboratively by the members of the Consortium for the Regional Support for Women in Disadvantaged and Rural Areas (hereafter, either the Women's Regional Consortium or simply the Consortium), which is funded by the Department for Communities and the Department of Agriculture, Environment and Rural Affairs.
- **1.2** The Women's Regional Consortium consists of seven established women's sector organisations that are committed to working in partnership with each other, government, statutory organisations and women's organisations, centres and groups in disadvantaged and rural areas, to ensure that organisations working for women are given the best possible support in the work they do in tackling disadvantage and social exclusion. The seven groups are as follows:
 - ☐ Training for Women Network (TWN) Project lead

 - ♀ Women's Support Network (WSN)
 - □ Northern Ireland's Rural Women's Network (NIRWN)
 - ♀ Women's TEC
 - ♀ Women's Centre Derry
 - ♀ Foyle Women's Information Network (FWIN)

¹ Sections 1.2-1.3 represent the official description of the Consortium's work, as agreed and authored by its seven partner organisation

- 1.3 The Consortium is the established link and strategic partner between government and statutory agencies and women in disadvantaged and rural areas, including all groups, centres and organisations delivering essential frontline services, advice and support. The Consortium ensures that there is a continuous two-way flow of information between government and the sector. It also ensures that organisations/centres and groups are made aware of consultations, government planning and policy implementation. In turn, the Consortium ascertains the views, needs and aspirations of women in disadvantaged and rural areas and takes these views forward to influence policy development and future government planning, which ultimately results in the empowerment of local women in disadvantaged and rurally isolated communities.
- **1.4** The Women's Regional Consortium appreciates the opportunity to respond to The Executive Office Consultation (TEO) on Free Period Products. Access to period products can create financial and wellbeing challenges for women, girls and those who have periods which can impact on their ability to participate in society and reach their full potential.
- **1.5** We wish to endorse the response made by the Women's Policy Group (WPG) of which the Women's Regional Consortium is a member.

2.0 General Comments

A period is a natural biological function which women, girls and people who menstruate cannot control and which can sometimes be very inconvenient. Despite the fact that a period is a natural bodily function it continues to be a taboo subject meaning that issues around periods are rarely discussed or given the attention that they need. The stigma around periods allows issues like affordability to go under the radar and can keep women and girls, trans and non-binary people struggling to manage their period on a monthly basis. This can have the result of limiting their potential and ability to participate in everyday life and can further exacerbate gender inequalities.

Period poverty is the term used to describe a lack of access to sanitary products due to financial restrictions. In other words, women, girls and people who menstruate are unable to use sanitary products because they can't afford them. There may be many reasons for this including low income, homelessness, abuse, health conditions which make a period more painful/heavy or because they have no income of their own. With an average period lasting around five days it can cost just under £11 a month² and some struggle to afford the cost. This leaves some women, girls and people who menstruate forced to use toilet roll, socks or even newspaper because they have been unable to pay for the sanitary products they need.

For younger women the inability to access these products can be detrimental to a girl's ability to learn and to actively participate in everyday life. It makes it difficult for girls to concentrate properly in school if they are worried about leaking or having to spend their lunch money on sanitary products.

Certain groups of people may have particular needs in terms of accessing period products over and above what is seen as a "normal" period. For some with certain health conditions such as endometriosis or polycystic ovary syndrome this can mean

² https://www.channel4.com/news/factcheck/period-poverty-is-real-but-the-average-woman-isnt-spending-500-a-year-on-menstruation

heavier or irregular periods requiring more period products and expense. In addition, pregnant women and those who have recently given birth often also need to use sanitary products to cope with bleeding. For older women who are going through the menopause there can be increased need for period products. As periods become more unpredictable during the menopause many women choose to wear period products such as sanitary pads on a more regular basis so that they feel more comfortable and will not be caught out. As one woman said "I wore a pad to work every day and felt completely confident." It is also the case that many trans men and non-binary people also menstruate and need access to period products.

Access to period products is therefore essential to the health and wellbeing of women and girls, trans and non-binary people to ensure that they can reach their full potential and enable them to fully grasp the opportunities available to them.

Women's Vulnerability to Poverty

Women are more likely to be in receipt of social security benefits, more likely to be in low-paid, part-time and insecure work and also more likely to be providing care either for children or other family members which limits their ability to carry out paid work. This contributes to keeping women's incomes generally lower over their lifetimes and therefore puts them at greater risk of poverty.

The social security system has a vital role to play in easing the impact of poverty on people and families. However, the welfare reform and austerity measures introduced have tended to limit the ability of the system to protect against poverty.³ Many of these changes have had more negative impacts on women than men. The House of

³ Protecting dignity, fighting poverty and promoting social inclusion in devolved social security, Dr Mark Simpson, Ulster University, June 2018

 $[\]frac{http://www.niassembly.gov.uk/globalassets/documents/raise/knowledge_exchange/briefing_papers/series}{7/simpson060618.pdf}$

Commons Library reported that 86% of the savings to the Treasury from the tax and benefit changes since 2010 will have come from women.⁴

Locally an analysis of the impact of the reforms by the Northern Ireland Human Rights Commission (NIHRC)⁵ showed that across most income levels the overall cash impact of the reforms is more negative for women than for men.

Research carried out by the Women's Regional Consortium on the impact of austerity and welfare reform on women⁶ and on the impact of Universal Credit on women⁷ paints an overwhelmingly negative picture of life for women on social security benefits and for those in low paid work. Their lives are fraught with financial insecurity, worry, debt and in some cases cold and hunger. Period poverty is just one symptom of the wider impacts of poverty on women's lives.

Women and the Cost-of-Living Crisis

Women are more likely to be affected by economic crises and the Cost-of-Living Crisis is no different. As women's incomes are generally lower over their lifetimes, often as the result of caring responsibilities, a greater likelihood of working part-time and of being in receipt of social security benefits, they have less protection against these crises. A decade of welfare reform and austerity policies which have hit women harder have caused many women on the lowest incomes to cut back and cut back until they can cut back no further.

http://researchbriefings.files.parliament.uk/documents/SN06758/SN06758.pdf

⁴ Estimating the gender impact of tax and benefit changes, Richard Cracknell, Richard Keen, Commons Briefing Papers SN06758, December 2017

⁵ Cumulative impact assessment of tax and social security reforms in Northern Ireland, NIHRC, November 2019

https://www.nihrc.org/uploads/publications/Final_CIA_report_Oct_2019.pdf

⁶ Impact of Ongoing Austerity: Women's Perspectives, Women's Regional Consortium Northern Ireland, March 2019

http://www.womensregionalconsortiumni.org.uk/sites/default/files/Impact%20of%20Ongoing%20Austerity%20Women%27s%20Perspectives.pdf

⁷ The Impact of Universal Credit on Women, Women's Regional Consortium Northern Ireland, September 2020

http://www.womensregionalconsortiumni.org.uk/node/150

Then they have been hit by the Cost-of-Living Crisis which has seen inflation hit double figures and steep rises in the cost of the most basic items. This is really concerning for those on the lowest incomes who spend a greater proportion of their household budgets on food and energy the prices of which are rising so fast.

Research by the Women's Regional Consortium on the impact of the Cost-of-Living Crisis on women⁸ has shown the following:

- 96% of women felt their financial situation was worse than it was the previous year;
- 91% of women reported difficulty paying their bills as a result of Cost-of-Living increases;
- Just over half of the women reported being in debt (56%) and of these 82% reported they had to borrow as a result of Cost-of-Living increases;
- 41% had needed to use a foodbank/other charitable support due to increases in the cost of living.

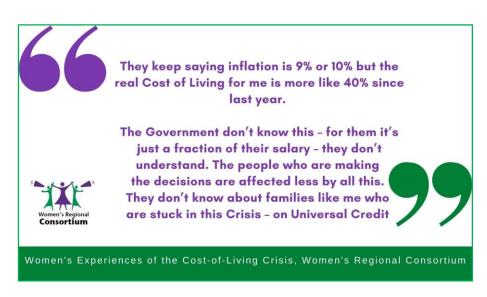
Women are often described as the 'shock absorbers' of poverty in the home, going without food, clothes and warmth to protect their children and other family members when money is tight. This poverty is very often unseen. It takes over and invades all aspects of their lives. The emotional toll caused by cost of living pressures and worries around making ends meet was very clear in the research. Women told us about the constant worry they had about money, the relentlessness of constantly juggling their household budgets, borrowing and trying to make ends meet. They talked about never getting away from worrying about money especially now as they are listening to all the media coverage about rising prices for the essentials.

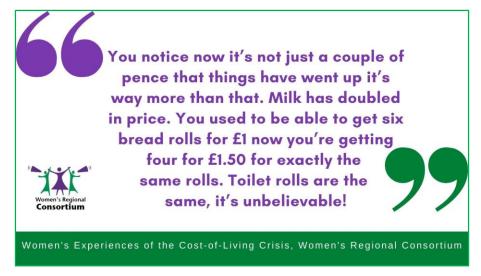
This poverty and financial hardship limits women's lives, their ability to contribute to society and for them and their children to reach their full potential. The following quotes

⁸ Women's Experiences of the Cost-of-Living Crisis in Northern Ireland, Women's Regional Consortium, June 2023

https://www.womensregionalconsortiumni.org.uk/wp-content/uploads/2023/06/Womens-Experiences-of-the-Cost-of-Living-Crisis-in-NI-2.pdf

from the research help to illustrate the depth of the Cost-of-Living Crisis for women and how seriously their household budgets are being impacted by rising prices. This will undoubtedly include the cost of period products. It is increasingly evident that for low-income households even a few pounds a month is unaffordable and often means that women, girls and those who menstruate will have to go without something else to afford these products.







The weekly shop has gone up, it's not 1p or 2p it's 20p/30p sometimes 50p an item



Women's Experiences of the Cost-of-Living Crisis, Women's Regional Consortium



It's the everyday basics that you need to get yourself through. It's essential to have toilet roll you've no choice but to buy it. It's not luxuries it's the things people need to live and survive that are going up



Women's Experiences of the Cost-of-Living Crisis, Women's Regional Consortium



The Cost-of-Living Crisis has definitely made my mental health issues worse.
You're literally worrying about all the bills, having to pay for heating, just everything.
Then I'm not sleeping at night. My anxiety and depression would be bad anyway, it had got a bit better but now it's



worse because everything is going up in price now

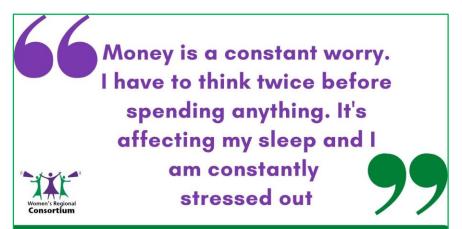
I'm worrying about bills more.
If it was only for six months
and after that you knew things
would get better but there
doesn't seem to be any
hope of it getting better



Women's Experiences of the Cost-of-Living Crisis, Women's Regional Consortium

It's just constantly all talk about the Cost-of-Living Crisis – it has impacts on your mental health. No matter what conversations you're having it's all about the cost of things. You know your moneys coming in and it's all going straight out again

Women's Experiences of the Cost-of-Living Crisis, Women's Regional Consortium





Women are usually the ones who manage the finances. They have to make things stretch. I know things I used to get that were a wee treat - now those things are gone. You're cutting back on every wee thing you can now



Women's Experiences of the Cost-of-Living Crisis, Women's Regional Consortium



We should not be charged for having periods. A box of tampons is £4. We're lucky in Atlas Women's Centre because there's a box of sanitary products for free here. I do use them because sometimes I can't afford

to get them myself



Women's Experiences of the Cost-of-Living Crisis, Women's Regional Consortium



Women are usually the ones who manage the finances. They have to make things stretch. I know things I used to get that were a wee treat - now those things are gone. You're cutting back on every wee thing you can now





We should not have to pay for sanitary products we did not choose to have a period!



Women's Experiences of the Cost-of-Living Crisis, Women's Regional Consortium

It's all girls in my house, I
have 3 daughters so I spend
a fair bit on sanitary
products. My husband
doesn't have to think
of those things

Women's Experiences of the Cost-of-Living Crisis, Women's Regional Consortium

Downstairs in Atlas Women's
Centre there's a bin filled with
different sanitary products. We're
very lucky we have access to that.
Honestly I do use it because
sometimes I can't afford it.
It's great that it's there

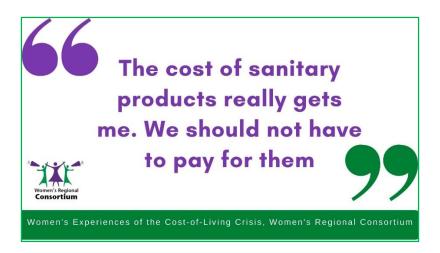


Women's Experiences of the Cost-of-Living Crisis, Women's Regional Consortium

Having to buy sanitary products for something that happens naturally, it doesn't make sense. I think sanitary products should be free

Women's Experiences of the Cost-of-Living Crisis, Women's Regional Consortium

It's ridiculous that we have
to pay for sanitary
products. There are 5 girls
in my house it's crazy it
should be free



Period Poverty Research

There has traditionally been limited data on period poverty but recently there has been more research on this issue. Previous research by **Plan International UK**⁹ has found that:

- one in ten girls (10%) said they had been unable to afford sanitary wear;
- one in seven girls (15%) said they had struggled to afford it;
- one in five girls (19%) have changed to a less suitable sanitary product due to cost:
- more than one in ten girls (12%) has had to improvise sanitary wear due to affordability issues.

This research also highlighted some further statistics on taboo and stigma surrounding periods and menstruation which are important considerations in taking action in this area:

- nearly half (48%) of girls aged 14-21 in the UK are embarrassed by their periods;
- only one in five (22%) girls feel comfortable discussing their period with their teacher;
- almost three quarters (71%) of girls admitted that they have felt embarrassed buying sanitary products;

⁹ <u>1 in 10 girls have been unable to afford sanitary wear | Plan International UK (plan-uk.org)</u> (October 2017)

- 49% of girls have missed an entire day of school because of their period, of which 59% have made up a lie or an alternate excuse;
- 64% of girls have missed a PE or sport lesson because of their period, of which
 52% of girls have made up a lie or excuse.

Locally, a survey carried out by **Homeless Period Belfast**¹⁰ with 200 school students across Northern Ireland found that:

- 74% have had to leave a lesson, school or miss a day entirely because of a lack of access to products;
- 53% have had to ask their teacher for period products due to not having any;
- 87% said that a lack of access to period products has negatively impacted their attention in class and/or school attendance;
- 91% have had to use toilet roll as a temporary measure at school;
- 89% stated that a lack of access to period products has affected their mental and emotional wellbeing.

Homeless Period Belfast also carried out a survey of 100 teachers across Northern Ireland and found that:

- 84% said that they have witnessed how the ongoing pandemic has exacerbated the need for period products in schools;
- 60% of teachers have had to buy period products out of their own wages.

In asking teachers how they felt about using their own money to stock period products in their classroom a teacher told Homeless Period Belfast: "It made me realise that families are really struggling to buy basic products for their daughters."

In talking to students about how being able to access free period products in toilets in school would impact on their experience in school a student told Homeless Period Belfast: "I wouldn't miss as much class time and I would feel a lot happier knowing the

¹⁰ The Homeless Period Belfast - Home | Facebook

products are in toilets so I don't have to feel embarrassed approaching the school nurse or my teachers."

Evidence provided to Homeless Period Belfast as part of their research included the following testimony from a 15-year old school girl:

"I dread getting my period in school. I have to make up that I am sick so I can go home because I'm too embarrassed to tell my friends that I don't have any money for pads and I can't ask my mummy because she's just lost her job and she's already struggling to do a food shop for me and my younger brother. I use toilet roll instead and I'd much rather use that at home and risk leaking in my own house than in school where everyone could see."

More recent research from **Action Aid**¹¹ around Period Poverty and the Cost of Living Crisis has found that 21% (more than one in five) women and people who menstruate in the UK are now struggling to afford period products - up from 12% in just one year. This amounts to an estimated 2.8 million people, putting around one million more people into period poverty versus last year. Their polling shows that of those affected by period poverty, 41% kept sanitary pads or tampons in for longer, and 8% re-used disposable pads, which can be dangerous in terms of their health and wellbeing. 37% said they had used tissues or cotton wool instead of sanitary products in the last 12 months. 13% used socks or other clothing, and 9% resorted to using paper or newspaper.

This research also found that more than a quarter of survey respondents (28%) said they were able to rely on period products available at school or work, but for 17% they stayed at home. This means missing out on school, work, exercising or socialising, all of which can have wider implications for their mental health, wellbeing, and future.

The Cost-of-Living Crisis is having significant impacts with many people having to prioritise essentials over buying period products and making difficult decisions about what to buy. The research found that 60% had to prioritise food, 48% had to prioritise

¹¹ UK Period poverty rises from 12 to 21% | ActionAid UK (May 2023)

gas/electricity and 24% sacrificed period products for themselves so they could afford period products for their dependant. Those aged 18-24 were most likely to struggle to afford period products with more than a quarter (27%) of this age group saying they were affected.

Polling with 1,000 girls aged 14-21 by **Plan International UK**¹² on Period Poverty and the Cost-of-Living Crisis shows that more than one in four (28%) are struggling to afford period products and nearly one in five (19%) have been unable to afford period products at all since the start of 2022. With the cost of essentials increasing significantly the survey found that over a quarter (26%) of UK girls are concerned about being able to afford period products over the coming months.

One in 10 of the young women who took part in the survey had to go to a food bank to obtain free period products. The polling also showed that half of the girls who struggled to afford period products since the start of 2022 had to cut back on food and groceries to be able to buy them – a number which has increased by almost double compared to the previous year. Nearly a quarter (23%) of the girls had to cut back spending money on school supplies and 19% cut back on buying non-prescription health products to afford period products.

Most of the girls who struggled or were unable to afford period products (80%) had used toilet paper as a substitute for period products which is up an eighth on the previous year. Around 12% have used socks, 10% have used newspaper/paper and 7% have used other fabric.

¹² https://www.huffingtonpost.co.uk/entry/how-to-donate-and-help-period-poverty-in-cost-of-living-crisis_uk_628ca612e4b0cda85db5700a (May 2022)

WaterAid research¹³ on the affordability of period products surveyed 2,000 UK women or non-binary people aged 14-50 years old who experience periods. The research found that almost a quarter (24%) said they or their family have struggled to afford period products in the last year and nearly a third (32%) worry they won't be able to afford them in the future. It also found that:

- 1 in 5 (20%) cope by using makeshift materials like toilet roll or sponges;
- 1 in 4 (26%) wear period products for longer than they should risking their health;
- 1 in 6 (15%) have missed school or work during their period;
- Nearly a quarter (24%) reported missing activities such as sport or social events due to struggles with affording period products;
- Over three fifths (61%) said if period products where cheaper or more free products were available it would improve their mental health or wellbeing;
- School age girls were among the hardest hit with 32 in 5 (41%) worrying about adding to the financial burden of their parent/caregiver and 1 in 5 (20%) admitting to missing school or work as a result of struggling to afford period products.

This research also found that 22% of the women had relied on free period products from work, school, a food bank or other charity while 30% have had to buy cheaper brands to cut costs. While steps have been taken to tackle period poverty in the UK the research highlighted that the majority (83%) of survey respondents thought more needs to be done on this issue – 71% stated there should be more places where you could get free period products and 61% wanted more support for schools to educate students on cost-effective ways to manage their periods.

¹³ In the red: WaterAid finds 1 in 4 UK women and girls struggle to afford period products as cost-of-living crisis takes its toll | WaterAid UK (May 2022)

3.0 Specific Comments

About You:

Are you responding as an individual or on behalf of an organisation?

Tick:	Local Council Area:	
	Individual	
✓	On behalf of an organisation	

If responding on behalf of an organisation, please tell us your organisation's name in the space below:

Women's Regional Consortium.

1. Where do you live?

Tick:	Local Council Area:
	Antrim and Newtownabbey Borough Council
	Ards and North Down Borough Council
	Armagh City, Banbridge and Craigavon Borough Council
	Belfast City Council
	Causeway Coast and Glens Borough Council
	Derry City and Strabane District Council
	Fermanagh and Omagh District Council
	Lisburn and Castlereagh City Council
	Mid and East Antrim Borough Council
	Mid Ulster District Council
	Newry, Mourne and Down District Council
√	Other

1a. If you selected "Other" please provide further detail in the space below:

We are a representative organisation working with the network of Women's Centres and Consortium partners and representing the views and experiences of women across Northern Ireland.

2. What is your postcode?

3. In order to make sure we are asking a broad section of the community for their views, please tell us a bit more about yourself. Please tick all that apply.

(Please note this information will remain anonymous and be treated as such. If answering on behalf of an organisation, please tick all that apply to your members.)

Tick all that apply:	About you:
√	I currently use period products.
✓	I will need to use period products in the future.
✓	I am a mother, sister, partner, or family member of someone who needs access to period products.
	I am a father, brother, partner, or family member of someone who needs access to period products.
✓	I do not need period products for myself, but for someone who does, who is not a family member.
	I prefer not to answer this question.
✓	Other

3a. If you selected "Other" please provide further detail in the space below:

We have selected a range of options as we are a representative organisation representing the views and experiences of women across Northern Ireland.

Staff and volunteers from Women's Centres and from Women's Regional Consortium partners may also need to access period products for service users.

4. Would you use free period products if they were available?

Tick:	Answer:
✓	Yes
	No

As we have previously stated in Section 2.0 of our response periods are a natural biological function which women, girls and people who menstruate cannot control. An inability to access period products can be detrimental in many ways including limiting access to education and training, participating in everyday life, social and sporting activities. They should not be punished for having periods or have to limit their lives due to affordability issues. Access to period products is therefore essential to the health and wellbeing of women, girls and those who menstruate enabling them to reach their full potential and to grasp the opportunities available to them. Menstrual health must be recognised as critical for gender equality so that no one is held back because of this natural biological function.

Periods do not stop for economic crises and we are increasingly concerned about the impact of the Cost-of-Living Crisis on women. We have highlighted some of these impacts in Section 2.0 of this response. We suggest that many more women, girls and those who menstruate are likely to have difficulty affording the period products they need. With cuts in the Northern Ireland budget resulting in cuts to important areas of help (including Discretionary Support and Discretionary Housing Payments), cuts in local

support services and increased reliance on food banks families are under greater financial pressure than ever. As women are often responsible for household budgets and are more likely to have to bear the burden of children's costs they are more likely to face increasing financial hardship in this Cost-of-Living Crisis which is likely to impact on their financial wellbeing long into the future.

5. What, if anything, would STOP you from accessing these free period products? (Please tick all that apply.)

Please remember that these products will be available for everyone whether or not they can afford to purchase them themselves.

Tick all	Answer:
that apply:	
	Being too embarrassed.
	If I don't know where I can get them.
	Can't get to the physical locations where free products may be provided? (Please provide further detail below. This may be related to transport issues, mobility issues, issues around insufficient disabled access, etc)
	For cultural or religious reasons (please provide further detail below.)
	I would prefer to purchase my own choice of products.
	Nothing would stop me.
✓	Other.

5a. If you selected "can't get to the physical location", "for cultural or religious reasons" or "Other" please provide further detail in the space below.

We are a representative organisation responding on behalf of women across Northern Ireland who may have a number of reasons for not accessing free period products. There are a range of reasons why people may be stopped from accessing free period products. There is still considerable shame and stigma around periods and this stigma allows issues like affordability to go under the radar and can keep women and girls, trans and non-

binary people struggling to manage their period on a monthly basis. Research by Action Aid¹⁴ shows that 'period positivity' may be in decline and that progress is not being made around this issue. Their survey found that 22% of young women and people who menstruate (aged 18-24) in the UK feel embarrassed during their period which is a significant rise from 8% in 2022. Of those who reported feelings of anxiety, embarrassment or shame 12% said that was because of jokes made about their period by a partner, friend, colleague or parent, 30% said it was because people would see them taking sanitary products to the toilet and 58% said it was because of fear of leaking onto their clothes.

Lack of awareness of the help available acts as a significant barrier to accessing the help that people need. Women's Regional Consortium research with women on the impact of the Cost-of-Living Crisis¹⁵ revealed that some women were missing out on important areas of help that they would have been entitled to because they did not know about this help. This included the Universal Contingency Fund (to help get through the five-week wait), the Adviser Discretion Fund (to help with upfront childcare fees) and the Healthy Start Scheme (which provides free milk, fruit and vegetables to those on low incomes). It is therefore vitally important that awareness raising around where free period products are available is adequately planned and resourced. We suggest that in order to reach the most marginalised this needs to be broader than purely online awareness.

Research by NIRWN shows that rural women are under increasing pressure from the economic climate leaving them experiencing more poverty and social isolation than ever before. Rural women are particularly vulnerable to access poverty meaning that they are unable to address their financial poverty if they lack access to affordable childcare and transport to allow them to access better paid, better quality jobs. Women's Regional

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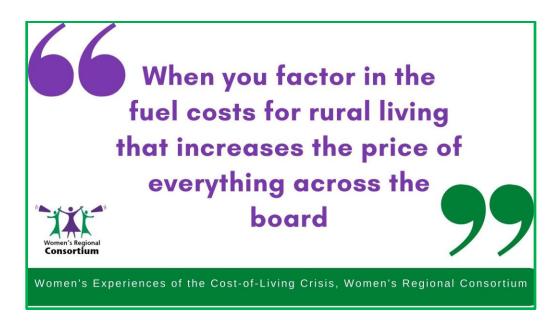
¹⁴ UK Period poverty rises from 12 to 21% | ActionAid UK

¹⁵ Women's Experiences of the Cost-of-Living Crisis in Northern Ireland, Women's Regional Consortium, June 2023

 $[\]underline{https://www.womensregionalconsortiumni.org.uk/wp-content/uploads/2023/06/Womens-Experiences-of-\underline{the-Cost-of-Living-Crisis-in-NI-2.pdf}$

¹⁶ Rural Women's Manifesto, NIRWN, September 2015 https://www.nirwn.org/wp-content/uploads/2016/12/NIRWN-Rural-Womens-Manifesto.pdf

Consortium research¹⁷ showed that 38% of the women who took part in the research reported that they were finding it most difficult to pay travel costs. Rural women were particularly exercised about the increasing costs of travel and how this impacted on their lives. It is therefore vitally important that there is sufficient access to free period products in rural areas where transport costs and access poverty are such significant issues.



There are a range of cultural/religious reasons that may stop people from accessing free period products. This may include stigma around periods as well as issues with the type of products provided. For some people from black, Asian and minority ethnic communities, products which require insertion into the body, such as tampons, are taboo leaving many scared to try these products. There can be long held traditional beliefs about cleanliness and virginity as well as health concerns including Toxic Shock Syndrome which can impact on product choice. This means that there must be adequate variety of free period products provided so that all women, girls and people who menstruate have the ability to access free products.

¹⁷ Women's Experiences of the Cost-of-Living Crisis in Northern Ireland, Women's Regional Consortium,

https://www.womensregionalconsortiumni.org.uk/wp-content/uploads/2023/06/Womens-Experiences-ofthe-Cost-of-Living-Crisis-in-NI-2.pdf

Given that periods can start as young as 12 years old there could be barriers for children and young people trying to access free period products. This may include a range of issues including embarrassment, lack of knowledge of where to get them, an inability to travel to access these products, etc. There may be particular issues for those children and young people who are in care or those who for whatever reason feel they are unable to speak to a parent, carer, trusted adult about their period or accessing period products.

6. Who would you be prepared to collect the free period products for? (Please tick all that apply).

Tick all that apply:	Who:
	Myself.
	Another person in the household.
	Another person not in my household.
	I would not be prepared to collect for someone else.
√	Other

6a. If you selected "Other" please provide further detail in the space below:

We are answering as an organisation not an individual but we believe free period products should be accessible to everyone for the use of anyone who needs them.

7. What free period products do you think should be available? (Please tick all that apply.)

Tick all that apply:	Product:
✓	Pads
✓	Applicator Tampons
✓	Non applicator Tampons
✓	Panty Liners
✓	Reusable Period Pants
✓	Reusable Menstrual cups
✓	Reusable pads
✓	Reusable panty liners
	Other

We believe that a full range of products should be available to ensure that the provision of free products is as inclusive and accessible as possible – see our response to Question 5a. We are fully supportive of the need to include reusable products – see our response to Question 8.

7a. If you selected "Other" please provide further detail in the space below:

8. How important or unimportant are reusable products to you? (Please tick one space only.)

Tick one:	Importance:
✓	Very Important
	Quite Important
	Not very important
	Not at all important

The Women's Regional Consortium alongside our colleagues in the Women's Policy Group are very supportive of the provision of reusable period products. Single use period products are not environmentally friendly and it is costly to dispose of these items:

- Disposal of single use menstrual products tampons, pads and applicators generates 200,000 tonnes of waste per year in the UK.
- Most single-use disposable menstrual pads can be made of up to 90% plastic.
- On average each household in Belfast produces 3.38Kg of hygiene product waste per year, this goes straight to landfill.¹⁸

We believe it is very important to support the provision of reusable period products as long as these can be accessed in a timely and affordable way. We note the Period Home Packs Scheme¹⁹ provided by Belfast City Council and Hey Girls to allow Belfast City Council residents to try reusable period products delivered to them free of charge. We would like to see this scheme being extended across Northern Ireland.

As we have outlined throughout this response the pressures of the Cost-of-Living Crisis and the rapid rises in the costs of the most essential items such as food and energy have put huge pressure on household budgets. This has caused many women, girls and people who menstruate to worry about affording period products. As research

¹⁸ https://www.heygirls.co.uk/belfasthomepacks/

¹⁹ https://www.heygirls.co.uk/belfasthomepacks/

shows over a quarter (26%) of UK girls are concerned about being able to afford period products over the coming months.²⁰ As the Cost-of-Living Crisis continues to be felt it is likely that many more people will face difficulties affording the products they need. This means that reusable products make even more financial sense as well as being environmentally friendly. Single use products are more expensive over time and therefore moving to reusables is really important providing that access to reusable products can be achieved for little or no cost especially for those on the lowest incomes who cannot afford the initial outlay required for these products.

9. Reusable products are more expensive. Alternative arrangements may be required to access these products. Would you be prepared to provide your contact details in order to obtain them?

Tick:	Answer:
✓	Yes
	No

10. How do you think period products ought to be made available? (Please tick all that apply)

Tick all that apply:	How:
✓	Collect in person form a physical location as required.
✓	Delivery. (You may be required to provide your contact details and may be required to pay costs associated with packing & delivery)
✓	An online or text pre order "click and collect" style service
	Other

²⁰ https://www.huffingtonpost.co.uk/entry/how-to-donate-and-help-period-poverty-in-cost-of-living-crisis_uk_628ca612e4b0cda85db5700a (May 2022)

We believe that free period products should be made available in a range of ways as outlined in the table above. This should help to ensure that they are provided in a way that meets the needs of most people who need to use them. Collecting in person from a physical location may suit those in urban areas better particularly if they live close to possible locations where these are provided or they have easy access to public transport. However, in rural areas this may not be the ideal way to avail of these products particularly if they do not live close to where the products can be collected or where access to transport is limited.

We understand that delivery costs can be expensive but this may be prohibitive particularly for those on the lowest incomes including young people, those living on social security benefits, those in low-paid/insecure work, those living in rural areas and those most adversely impacted by the Cost-of-Living Crisis. Ideally, we would like to see delivery costs being free to ensure these products are as accessible as possible.

10a. If you selected "Other" please provide further detail in the space below:

11.In terms of physical locations where do you think would be the best places to obtain free period products from? (Please tick all that apply).

(Please note: Schools are not included in this list as they are not accessible by the general public and provision is already made for those in schools by the Department of Education.)

Tick all that apply:	Location:
✓	Public Libraries
✓	Public buildings (Please provide further detail in the space below)
✓	Museums/Cultural spaces
✓	Community venues (Please provide further detail in the space below)
	Other (Please provide further detail in the space below)

We believe that free period products should be available as widely as possible across as many physical locations as is practicable to ensure accessibility. Where physical locations are going to provide free period products it is important that they should also ensure that bins are provided for the disposal of period products.

11a. If you have selected "Public buildings", "Community venues" or "Other" please provide further detail and/or examples in the space below.

The Women's Regional Consortium suggest that the following locations would also be good places to obtain period products from:

- Women's Centres
- Sure Start Offices

- Jobs & Benefits Offices
- Advice Agencies
- Wider Women's Sector Organisations such as Women's Aid
- Foodbanks
- Leisure Centres
- GP Surgeries
- Charities/Organisations that work directly with those on low incomes/poverty
- Charities/Organisations that work directly with migrants and minority ethnic communities
- Charities/Organisations that work directly with LGBTQI+ people
- Charities/Organisations that work directly with homeless people.
- 12. Given the legislation indicates that the provision of free period products must respect privacy, dignity, and confidentiality where within a building would you feel most comfortable accessing Free Period Products?

 (Please tick all that apply.)

Tick all that apply:	Location:
✓	In the toilets of relevant buildings
✓	At the reception area.
	In a discreet location within the building.
	On a display stand in the building.
	Other.
	Don't have a preference

The Women's Regional Consortium believe that first and foremost free period products should be located in all the toilets in relevant buildings. This should include the men's toilets to ensure access for trans men and in all disabled and

changing places toilets. Period products should be viewed just like toilet roll and universally provided in toilets. This would help to ensure that anyone who takes their period unexpectedly, people with irregular and very heavy periods, people who have forgotten their period products or who struggle to afford them and those who take their period for the first time have access to the products they need to cope with a natural bodily function.

Providing free period products in the cubicles of toilets helps to deal with the stigma around periods and is also the most practical option in terms of respecting privacy, dignity and confidentiality. We agree with our colleagues in the Women's Policy Group that contact details should be provided within the toilets of who to contact in the event that the free period products have run out.

In order to help with awareness, it would be useful for buildings that provide free period products to carry a poster at reception stating that these products are provided in the toilets.

We believe that having access to free period products in the reception area could also be beneficial to help with reducing the stigma and helping to increase education and awareness around periods. We agree with our colleagues in the Women's Policy Group that it would be helpful if these products did not have to be requested and are clearly visible.

12a: If you selected "Other" please provide further detail in the space below:

13. How do you think the provision and location of free period products should be publicised? (Please tick all that apply.)

Tick all that apply:	Answer:
✓	NI Direct website.
✓	Dedicated App showing the locations of free period products.
✓	Local media (e.g., local newspapers, local radio, etc)
✓	Social media.
✓	Prominently displayed within the relevant location supplying the products.
✓	Other – please provide more information.

We believe that information about the location and provision of free period products should be publicised as widely as possible. We welcome the suggestion of a dedicated App showing the locations of free period products and believe this would be particularly beneficial for younger people.

As we have outlined in our answer to Question 5a we know that some women miss out on existing forms of help available due to lack of awareness. We therefore believe it is vitally important to ensure that publicity about the scheme takes a number of different forms and that these must go beyond purely online sources. Highlighting the scheme through local media and through displaying details of the scheme within the relevant locations is also important. In our work with local women we observe that women often find out the information they need from more informal sources and by word of mouth rather than from Government websites. This is important for reaching those who are the most marginalised who do not access information online and are less likely to use social media.

13a: If you selected "Other" above please provide further detail in the space below:

Physical posters providing details about the scheme and where to get further information could also be useful in publicising the provision/location of the products. These could be distributed to the organisations listed in our answer to Question 11a.

Agencies who provide advice particularly around social security benefits and debt advice should provide information about the availability of free period products to those who may need it. It should be included in the information given to people particularly those on low incomes and should also be included as part of a script on telephone helplines where advice is provided to ensure that awareness is raised about this important help.

We know that local magazines and publications like the Belfast City Council 'City Matters' magazine are also important sources of information particularly for those who may have no or limited access to social media.

14. If the locations of products were to be provided via an app how likely or not likely are you to use this app?

Tick one:	Likelihood:
✓	Very likely
	Somewhat likely
	Not very likely
	Not at all likely

15. Some groups (such as those from certain cultural backgrounds, those with a disability, those who are homeless, etc.) are likely to have certain specific needs when accessing free period products. Please provide any further information you think is relevant or should be taken into account to meet the needs of such groups in the space below.

As we have previously stated in our answer to Question 5a we believe that there needs to be a wide a range of products available as possible to ensure that those from all cultural backgrounds can access the free period products they need. This should include products that do not require insertion into the body such as pads.

We agree with our colleagues in the Women's Policy Group that there are additional considerations for those who are homeless which could include issues with washing, etc. In these cases, consideration should be given to providing not only free period products but access to wipes and clean underwear.

Impact assessments:

16.A number of impact assessment screening exercises have been carried out and are listed separately here www.executiveoffice-ni.gov.uk/consultations/consultation-freeperiod-products
If you have any additional comments or information please provide further detail in the space below.

We commend TEO for a thorough Section 75 screening using the most recent Census data and for the inclusion of a Data Protection Impact Assessment and a Human Rights Impacts Assessment. It is clear that considerable effort has been put into the production of these documents. We agree with our colleagues in the Women's Policy Group that the likely impact on equality of opportunity for those affected by this policy could be major (positive) rather than minor (positive) for the Section 75 groups identified.

We are also pleased to see that TEO has carried out a Rural Needs Impact
Assessment as part of this consultation which recognises the needs of rural
communities in the distribution of free period products. We welcome the wide range
of consultation which took place with rural community representatives including our
Consortium partner NIRWN as part of this process. We also commend TEO for

meeting with Scottish officials who are further ahead on the provision of free period products in order to learn from them on how they meet rural needs in this regard.

Any other comments / feedback:

17. Please provide any further comments and / or feedback you wish to make in relation to the provision of free period products in the space below.

Period products are a necessity not a luxury and they should be treated as such. Periods do not stop during times of economic crisis and therefore Governments need to prioritise the needs of women, girls and people who menstruate to ensure they can manage their periods with dignity and try to alleviate period poverty. This is critical for gender equality to ensure that no one is held back because of a natural process. The provision of free period products is an essential step in this process and we welcome the roll out of this scheme.

We are concerned that in the current environment of budget cuts that there could be insufficient funding available to ensure the successful roll out of this scheme. The provision of free period products is an important step forward for women, girls and people who menstruate but must be provided with the necessary funding to ensure these products reach those who really need them.